

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION

GWENDOLYN JAMES, as Administrator of §
the Estate of George James, and §
GWENDOLYN JAMES, Individually, §
§
Plaintiffs, §
§
vs. §
§
LAWRENCE GROSS, Individually, BP §
EXPRESS, INC., JOHN AND JANE DOES §
1-30, and BUSINESS/CORPORATE §
ENTITIES A-Z, §
§
Defendants. §
§

CIVIL ACTION FILE

NO. 5:19-cv-00349-MTT

**DEFENDANTS LAWRENCE GROSS AND BP EXPRESS, INC'S
CERTIFICATE OF NEED TO FILE DISCOVERY**

COME NOW LAWRENCE GROSS and BP EXPRESS, INC, Defendants in the above-styled civil action, and, pursuant to Local Rules 5.1, certify that they have need to file the following documents in support of their Motion for Partial Summary Judgment and supporting Memorandum of Law:

- October 22, 2020 Deposition of Lawrence Gross;
- October 22, 2020 Deposition of Willie Collins; and
- November 16, 2020 Deposition of Sam O'Ham.

Pursuant to United States District Court for the Middle District of Georgia Local Rule 5.1, the undersigned certifies that the aforementioned discovery documents have been used in the proceedings and in support of Defendants' Motion for Partial Summary Judgment and supporting Memorandum of Law.

[Signature contained on next page.]

This 11th day of January, 2021.

**CRUSER, MITCHELL, NOVITZ,
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/s/ J. Robb Cruser

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and BP Express, Inc.*

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the undersigned has this day electronically filed the within and foregoing **DEFENDANTS LAWRENCE GROSS AND BP EXPRESS, INC'S CERTIFICATE OF NEED TO FILE DISCOVERY** with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to the following attorneys of record:

Glenda A. Hatchett, Esq.
Christopher L. Johnson, Esq.
The Hatchett Firm, PC
191 Peachtree Street, NE, Suite 2600
Atlanta, GA 30303

This 11th day of January, 2021.

**CRUSER, MITCHELL, NOVITZ,
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